## **OUTTEN & GOLDEN LLP**

Rachel Bien Juno Turner Michael N. Litrownik 3 Park Avenue, 29<sup>th</sup> Floor New York, New York 10016 Telephone: 212-245-1000

## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

LAUREN BALLINGER and MATTHEW LEIB, on behalf of themselves and all others similarly situated,

Plaintiffs,

Case No. 13 Civ. 4036 (HP)

v.

ADVANCE MAGAZINE PUBLISHERS, INC. d/b/a/ CONDÉ NAST PUBLICATIONS,

Defendant.

## NOTICE OF PLAINTIFFS' MOTION FOR APPROVAL OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Approval of Attorneys' Fees and Reimbursement of Expenses, the Declaration of Rachel Bien in Support of Plaintiffs' Motion for Certification of the Settlement Class, Final Approval of the Class Action Settlement, and Approval of the FLSA Settlement, Motion for Approval of Attorneys' Fees and Reimbursement of Expenses, and Motion for Approval of Service Payments and the supporting exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

(1) awarding Class Counsel attorneys' fees of eleven point eleven percent (11.11%) of the Settlement Fund (\$650,000.00), plus costs of \$8,474.99 and reimbursement

of \$39,750 in LinkedIn fees advanced for purposes of facilitating class notice through LinkedIn; and

(2) granting such other, further, or different relief as the Court deems just and proper.

Dated: June 24, 2015

New York, New York

Respectfully submitted, **OUTTEN & GOLDEN LLP** 

/s/ Rachel Bien

Rachel Bien

Rachel Bien Juno Turner Michael N. Litrownik 3 Park Avenue, 29th Floor New York, New York 10016 Telephone: (212) 245-1000

Attorneys for Plaintiffs, the Class, and the Collective